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Granted
So ordered
s/John Gleeson
USDJ
6-30-06

Sam A. Schmidt, Esq.

Of Counsel
Peter Nissman, Esq.

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ JUL 19 2006 ★
BROOKLYN OFFICE

June 30, 2006

Hon. John Gleeson. USDJ
United States Courthouse
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: *United States v. Brenda Mayo*
Cr. ~~04~~ 05-43 (JG)

Dear Hon. Judge Gleeson:

Presently, Ms. Mayo's geographical limitations of her bail include the Eastern and Southern Districts of New York. Ms. Mayo has been asked by her sister, Angelina, to bring Angelina's children to Alderson WV, where she is incarcerated, for a July 4 bar-b-que for inmates and visitors. Ms. Mayo wishes to travel there with the children

I have previously informed the government of this request and assumed that we would resolve this today. However, because of my error in believing that the sentencing hearing was scheduled for 2 PM, the matter has been adjourned and we will not appear prior to the picnic. Mr. Freedman has previously not opposed such temporary geographical modifications.

Therefore, I respectively request that your Honor enlarge the geographical limitations of the bail and permit Ms. Mayo to travel to and from Alderson, West Virginia between July1, 2006 and July 5, 2006.

If your Honor requires any additional information, please have chambers contact my office. Presently my telephone system is not working. I can be reached at (917) 687-8620, by E-mail, or a colleague's facsimile at (212) 346-7719.

Thank you for your Honor's consideration.

Sincerely,

Sam A. Schmidt

cc: AUSA Lee Freedman

Michael Ilaria, PTSO

Copy faxed

Law Office of Sam A. Schmidt

Attorney at Law

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DATE: June 30, 2006

TIME: ~~11~~ 1:45 AM

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Re: U.S. v. Brenda Mayo

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